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17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
THOMAS J. PARDINI IN SUPPORT
OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR MOTION
IN LIMINE NO. 27 TO EXCLUDE
DR. HESSELINK'S SAVED
DEVELOPMENT TIME OPINIONS**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Their Motion in Limine No. 27 to Exclude Dr. Hesselink's Saved Development Time Opinions.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Motion in Limine No. 27 ("Motion")	Highlighted Portions	Plaintiff (green) Defendants (blue)
Exhibit 1	Highlighted Portions	Defendants (blue)
Exhibit 2	Highlighted Portions	Plaintiff (green)
Exhibit 3	Entire Document	Plaintiff Defendants
Exhibit 4	Entire Document	Plaintiff Defendants
Exhibit 5	Entire Document	Plaintiff Defendants

3. The blue-highlighted portions of the Motion and Exhibit 1 contain launch timeline estimates taken from an internal Uber document. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into Uber's estimates for its launch timeline, such that Uber's competitive standing could be significantly harmed.

6. Defendants' request to seal is narrowly tailored to the portions of the Motion and its supporting exhibits that merit sealing.

Thomas J. Pardini

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has concurred in this filing.

MICHAEL A. JACOBS